

Document Log Item

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EPA comments on NSTI Draft SAP Soil Gas Investigation	06/24/2008 05:48 PM
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Body

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Mr. Perry -

I reviewed the NSTI Draft SAP Soil Gas Investigation and comments provided by the DTSC, Regional Water Quality Control Board, and TIDA. I have the following additional comments and clarifying questions:

- SAP Worksheet #10 – Problem Definition and Background, Page 23. A secondary goal of this investigation is to use the findings to determine whether soil gas samples should be collected at other sites at NAVSTA TI with similar sporadic, low-level VOC concentrations

in soil. It is unclear if this simply means sites with no known source or if there are other bases of comparison that will be used to apply the findings of this investigation to other sites.

- SAP Worksheet #10 – Problem Definition and Background, Page 24. If a chemical is detected in soil gas at a concentration exceeding project action limits, step-out samples will be collected 15 feet from the original sample in four directions. Will preferential pathways into structures be considered in the placement of step-out samples or is the objective solely to assess VOC concentrations in the area?
- SAP Worksheet #11 – Project Quality Objectives/Systematic Planning Process Statements, Page 30.
- Step 3: The ESLs were developed using a model. In accordance with EPA QA/G-5M, a site-specific calibration and/or verification should be performed for models. It is recommended that the Navy prepare a table describing model assumptions and rationale for applicability to the Treasure Island site. Further, for the purpose of verification, it is recommended the Navy take a limited number of indoor air samples. These indoor air samples should include buildings that have high negative pressure due to ventilation, high sensitivity locations, and locations that are near contaminant plumes or have utility lines that pass near plumes prior to entering the building.
- Step 4: The vertical boundaries cover a 2-foot space above the groundwater table. Is the vertical boundary based on convention, guidance, or site-specific information?
- Step 5: The stakeholders may consider whether soil gas samples should be collected at specific locations at other IR sites while the mobile laboratory is on site. It is unclear how and when the specific locations and sites will be selected.
- SAP Worksheet #14 – Summary of Project Tasks, Page 35. During this investigation, the underground utilities will be located using geophysical techniques. It is unclear if the previous sample locations to evaluate the potential for vapor intrusion were selected taking potential preferential pathways into account. How will this information be used?
- An action item from the June 16 scoping meeting was for the Navy to compare CHHSL and ESL (using EPA 2002) and clarify the use of CHHSL rather than ESL in the criteria table. It is unclear if this action item is closed and, if so, where the comparison is documented.
- Figure 9, Soil Gas Sampling Plan Flow Chart – Has the Navy considered collecting indoor air samples or subsurface samples under residences as part of the investigation? Collecting

a limited number of indoor air or subslab samples could serve as a line of evidence to validate any assumptions and support the primary goal of this investigation.

- TI and YBI Redevelopment Plan, Page 5. It is unclear from the development plan whether the residences on Site 12 will remain or be replaced with new residential structures. If the residences are to be replaced, will the Navy sample beneath the buildings to evaluate the potential for vapor intrusion into future buildings?

Sincerely,

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